

EXHIBIT 4

Ethan Kovar

From: Joon Chung
Sent: Tuesday, January 9, 2024 3:56 PM
To: sdraffin@keyhanillc.com
Cc: Jacqueline Altman; Bailey Benedict; Jeannet Santos; palmer@namanhoell.com; Andy Powell; dkeyhani@keyhanillc.com; fstephenon@keyhanillc.com; atindel@andytindel.com; FRService-Samsonite-23cv196; Christina Chambers
Subject: RE: Swissdigital v Samsonite - Case 6:23-cv-196: 2023-10-16 Samsonite Resp re Swissdigital Ltr re JX Disc Deficiencies

Counsel,

Samsonite International will not provide full residential addresses for former or current employees. The state of residence is sufficient for Swissdigital to understand that venue is not proper in the **Western District of Texas**, regardless of whether a few of the dozens of individuals we have identified may be within or outside of the **Massachusetts** court's subpoena power. None of Samsonite's relevant operations or employees are in Texas. Full residential addresses for individuals residing outside of Texas will not change that fact. Swissdigital has what it needs for venue discovery purposes. Please let us know whether you intend to file an amended response to Samsonite International's motion to dismiss or transfer venue by this Friday, January 12, so that we may otherwise notify the Court that venue discovery is completed and the motion is ready for resolution.

Best,
Joon

From: sdraffin@keyhanillc.com <sdraffin@keyhanillc.com>
Sent: Wednesday, December 27, 2023 3:08 PM
To: Joon Chung <chung@fr.com>
Cc: Jacqueline Altman <jaltman@namanhoell.com>; Bailey Benedict <benedict@fr.com>; Jeannet Santos <jsantos@fr.com>; palmer@namanhoell.com; Andy Powell <powell@namanhoell.com>; dkeyhani@keyhanillc.com; fstephenon@keyhanillc.com; atindel@andytindel.com; FRService-Samsonite-23cv196 <FRService-Samsonite-23cv196@fr.com>; Christina Chambers <cchambers@namanhoell.com>
Subject: RE: Swissdigital v Samsonite - Case 6:23-cv-196: 2023-10-16 Samsonite Resp re Swissdigital Ltr re JX Disc Deficiencies

[This email originated outside of F&R.]

Dear Counsel,

Thank you for the supplemental responses and production served by Samsonite International on Dec. 4, 2023.

Amended Appendix A provides only the last known state of residence for current Samsonite employees. It is unclear why current information would not be available for current employees; perhaps this was a mistake. We ask that full residential addresses (not merely the state of residence) of all identified employees currently employed by Samsonite be produced.

Further, we ask that full last known addresses of former Samsonite employees based in Rhode Island and New Hampshire as identified in Amended Appendix A be produced. These individuals are: Josie Blatchford, Jenna Young, Katie Booth, Michael Harris, Danielle Harrod, Joe Granata, and Michaela Ferreira. While we understand that the current locations of these former employees are not within Samsonite International's possession, custody, or control, full last known addresses of these particular employees are necessary for Swissdigital to determine whether they are potentially subject to the Massachusetts Court's Rule 45 subpoena power.

Finally, Swissdigital's First Amended Preliminary Infringement Contentions, served on Dec. 4, 2023, identified an additional accused product—the "Samsonite Just Right Standard Backpack." We ask that the corresponding design package identifying the designer, product manager, costing, and sales individuals be produced.

Best,

Scott Draffin
Keyhani LLC

-----Original Message-----

From: "Joon Chung" <chung@fr.com>
Sent: Monday, December 4, 2023 6:33pm
To: "Jacqueline Altman" <jaltman@namanhowell.com>, "sdraffin@keyhanillc.com" <sdraffin@keyhanillc.com>
Cc: "Bailey Benedict" <benedict@fr.com>, "Jeannet Santos" <jsantos@fr.com>, "palmer@namanhowell.com" <palmer@namanhowell.com>, "Andy Powell" <Powell@namanhowell.com>, "dkeyhani@keyhanillc.com" <dkeyhani@keyhanillc.com>, "fstephenson@keyhanillc.com" <fstephenson@keyhanillc.com>, "atindel@andytindel.com" <atindel@andytindel.com>, "FRService-Samsonite-23cv196" <FRService-Samsonite-23cv196@fr.com>, "Christina Chambers" <CChambers@namanhowell.com>
Subject: RE: Swissdigital v Samsonite - Case 6:23-cv-196: 2023-10-16 Samsonite Resp re Swissdigital Ltr re JX Disc Deficiencies

Counsel,

Samsonite International served supplemental interrogatory responses and a supplemental production today. We believe those supplemental responses and document production address all of Plaintiff's concerns about venue discovery, and consider this issue moot. Regarding financials, that is a Rule 408 issue unrelated to venue, and Samsonite International will not provide its financials at this time.

Separately, we did not receive Plaintiff's promised updated infringement contentions last week. Please let us know when we should expect those contentions.

Best,
Joon

From: Jacqueline Altman <jaltman@namanhowell.com>
Sent: Monday, December 4, 2023 12:22 PM
To: sdraffin@keyhanillc.com; Joon Chung <chung@fr.com>
Cc: Bailey Benedict <benedict@fr.com>; Jeannet Santos <jsantos@fr.com>; palmer@namanhowell.com; Andy Powell <Powell@namanhowell.com>; dkeyhani@keyhanillc.com; fstephenson@keyhanillc.com; atindel@andytindel.com; FRService-Samsonite-23cv196@fr.com; Christina Chambers <CChambers@namanhowell.com>
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Counsel,